



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

NOTES OF CASES.

Accident Insurance—"Surgeon" Does Not Include Veterinarian.—

In *Maupin v. Southern Surety Co.*, 220 S. W. 20, the Missouri Court of Appeals discusses the liability of an insurance company to the widow of a veterinary surgeon on a policy providing for liability in the event of injury to an insured physician, surgeon, or dentist while performing a surgical operation. Insured, in the instant case, while vaccinating some hogs and slitting the ears of those treated so as to distinguish them from the untreated ones, accidentally cut his finger, as result of which blood poison set in, resulting in his death.

The court said: "The controversy hinges on the construction of 'surgeon' and 'surgical operation' as used in the policy. * * * The word 'surgeon,' unqualified, in the mind of the ordinary individual, means one possessed of such knowledge of the human body, and such other knowledge as the laws of our land require, and possessed of such skill in the use of instruments that he may be expected with reason to correct or relieve some unnatural condition of the human body. We do not think that the 'mass of mankind' would connect the idea of a veterinarian with the word 'surgeon,' as that word is generally used. We would be doing violence to what we think is the only reasonable construction of the contract of insurance, when all the specifications are considered together, to say that the word 'surgeon,' as used in specification 12, is broad enough to include a veterinarian."

Husband and Wife—Right of Wife to Maintain Action against Husband for Infection with Venereal Disease.—In *Crowell v. Crowell*, 105 S. E. 206, the Supreme Court of North Carolina held that under a statute, which had been construed to confer upon the wife the right to maintain an action against her husband, a wife whose husband has wrongfully infected her with a venereal disease may maintain action against him for damages as for personal injuries.

The court said in part: "As the plaintiff's counsel well said, aside from the question of assault, it is a well-settled proposition of law that a person is liable if he negligently exposes another to a contagious or infectious disease (*Skillings v. Allen*, 143 Minn. 323, 173 N. W. 663, 5 A. L. R. 922); a fortiori the defendant would be liable in the present case whether guilty of an assault or not, and independent of the fraud or concealment. In *Schultz v. Christopher*, 65 Wash. 496, 118 Pac. 629, 38 L. R. A. (N. S.) 780, and in *Bandfield v. Bandfield*, 117 Mich. 80, 75 N. W. 287, 40 L. R. A. 757, 72 Am. St. Rep. 550 (cases cited by the defendant), the court recognized that the infection of the wife with venereal disease by the husband was a tort, but held that under their statutes, which differ from those in this state, the wife could not sue her husband for a tort upon her person. But